

IN THE SUPREME COURT OF FLORIDA
BEFORE THE FLORIDA JUDICIAL QUALIFICATIONS COMMISSION

SC13-1333

INQUIRY CONCERNING A JUDGE No. 12-613

LAURA M. WATSON

JUDGE WATSON'S REQUEST FOR ORAL ARGUMENT

Appellant, the Honorable Laura M. Watson (hereinafter "JUDGE WATSON"), by and through undersigned counsel, and pursuant to Rule 2.310, Florida Rules of Judicial Administration, respectfully files this Request for Oral Argument and in support thereof states as follows:

1. The JQC investigated and charged Judge Watson with disputed pre-judicial misconduct alleged to have occurred between 2002-2004, when she was not a judge, was not a candidate for judicial office, and was not performing any judicial function. This alleged pre-judicial misconduct formed the sole basis for the JQC's jurisdiction and its final determination that Judge Watson is allegedly presently unfit for office.
2. Judge Watson was initially charged with violating both the Code of Judicial Conduct, which governs the conduct of members and candidates of the judiciary, and the Rules Regulating the Florida Bar, which governs the conduct

of attorneys.

3. In its Reply Brief, the JQC conceded, for the first time, that Judge Watson did not violate the Code of Judicial Conduct. Thus, its recommendation of removal from office for present unfitness to serve is based solely upon pre-judicial misconduct from nearly a decade ago that constitutes an alleged violation of the Rules Regulating the Florida Bar.
4. The JQC has never exercised jurisdiction over a sitting judge without some allegation of current judicial misconduct and/or a violation of the Code of Judicial Conduct.
5. The JQC has never recommended the removal of a sitting judge for present unfitness to serve without some allegation of current judicial misconduct and/or a violation of the Code of Judicial Conduct.
6. The issues in this case have broad constitutional consequences both for the public and the Judiciary. The asserted expansion of the JQC's jurisdiction and power is inconsistent with the limits of its constitutionally-derived authority.

WHEREFORE the Appellant, JUDGE WATSON, respectfully requests that the Court permit Oral Argument on this case.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via the E-Filing Portal by e-mail on this 23rd day of October, 2014 to: Marvin E. Barkin, Esquire, and Lansing C. Scriven, Esquire, Special Counsel for the JQC, Trenam, Kemker, Scharf, Barkin, Frye, O'Neill & Mullis, P.A. 101 East Kennedy Boulevard, Suite 2700, Tampa, Florida 33602 (Email: mbarkin@trenam.com; lscriven@trenam.com); Lauri Waldman Ross, Esquire, Counsel to the Hearing Panel of the JQC, Ross & Girten, 9130 South Dadeland Boulevard, Suite 1612, Miami, Florida 33156 (Email: RossGirten@Laurilaw.com, Susie@Laurilaw.com); Michael L. Schneider, Esquire, General Counsel to the JQC, 1110 Thomasville Road, Tallahassee, Florida 32303 (Email: mschneider@floridajqc.com); David B. Rothman, Esquire, Rothman & Associates,

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Pursuant to FJQCR Rule 10(b) a copy is furnished by e-mail to: The Honorable Kerry I. Evander, Chair of the JQC, 300 S. Beach Street, Daytona Beach, Florida 32114 (Email: evanderk@flcourts.org).

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